

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHER DISTRICT OF NEW YORK**

CAR-FRESHENER CORPORATION, <i>et al.</i>	)	
	)	
Plaintiffs,	)	Case No. 5:19-cv-01158-GTS-ATB
	)	
v.	)	<b>DECLARATION OF</b>
	)	<b>SLAWOMIR M. WARZOCHA</b>
SCENTED PROMOTIONS, LLC, <i>et al.</i>	)	
	)	
Defendants.	)	
	)	

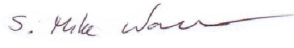
I, Slawomir M. Warzocha, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct, unless stated on information and belief.

1. I am one of the Defendants in this action, and currently reside at 2710 Macadamia Lane, Santa Barbara, CA, 93108. This declaration is based upon my personal knowledge of the matters set forth herein.
2. I respectfully submit this Declaration in support of the Defendants Motion to Vacate the Clerk's Entry of Default in this action.
3. Around the time of the filing of the Complaint, I was preoccupied with and still attending to the affairs and estate of my brother, who had died in Poland on August 2, 2019.  
Subsequent to his death, I was involved in making arrangements for my brother's funeral that eventually took place on November 15, 2019.
4. Additionally, my daughter, Defendant Paulina Slusarczyk, was and currently still is pregnant.
5. I retained a Nevada attorney, Jakub Medrala, Esq. to attempt to obtain an extension of time to respond to the Complaint, since it was necessary for me to travel to Poland to make funeral arrangements and to attend to my brother's estate.

6. Upon information and belief, Attorney Medrala is not admitted to practice law in the state of New York or in this Court.
7. During the period November 10 - November 26, 2019, I was in Poland making funeral arrangements and attending to my brother's estate.
8. On November 8, 2019 Attorney Medrala contacted counsel for the Plaintiffs and requested a thirty (30) day extension of time to respond to the Complaint.
9. In this request, Attorney Medrala specifically noted "[w]e are in the process of engaging a local [New York] attorney, but it has been difficult due to the fact that Mr. Warzocha is traveling out of country, and Ms. Slusarczyk is currently focusing on her health and pregnancy."
10. On November 11, 2019, Plaintiffs' counsel responded by refusing to consent to a thirty (30) day extension, and instead offered a ten (10) day extension of time to Answer or otherwise plead to the Complaint.
11. On December 2, 2019, upon my return to the United States, I emailed the Plaintiffs' counsel directly, and reiterated that I had been travelling out of the country, and that my daughter was pregnant; I requested a further thirty (30) day extension to respond to the Complaint, and made an offer of settlement.
12. On December 17, 2019, counsel for the Plaintiffs responded to my December 2, 2019 email, noting that the Plaintiffs were moving forward with obtaining a default judgment while rejecting my offer of settlement.
13. During this fifteen (15) day intervening period, I began contacting attorneys in New York to represent me and the other Defendants in this matter.

14. On or about January 10, 2020, I eventually was able to retain The Bilicki Law Firm, P.C.  
to represent me and the other Defendants in this matter.

Dated: January \_17\_, 2020

  
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Slawomir M. Warzocha